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PER L.R. IA 11-1(b)

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY,

Plaintiff,

vs.

NORTH AMERICAN TITLE INSURANCE  
COMPANY,

Defendant.

Case No.: 2:22-cv-00547-GMN-BNW

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND  
TO COMPLAINT (ECF No. 1-1)**

**FOURTH REQUEST**

COMES NOW defendant North American Title Insurance Company (“North American”) and plaintiff Deutsche Bank National Trust Company (“Deutsche Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On March 29, 2022, Deutsche Bank filed its complaint in the Eighth Judicial District Court for the State of Nevada;
2. On March 31, 2022, North American removed the instant case to the United States District Court for the State of Nevada (ECF No. 1);
3. On April 28, 2022 the Court granted the parties’ first stipulation for an extension of time to respond to the complaint, extending North American’s response deadline to May 27, 2022 (ECF No. 11);

1           4.       On June 2, 2022, the Court granted the parties' second stipulation for an extension  
2 of time to respond to the complaint, extending North American's response deadline to June 27,  
3 2022 (ECF No. 17);

4           5.       On June 30, 2022, the Court granted the parties' third stipulation for an extension  
5 of time to respond to the complaint, extending North American's response deadline to July 27,  
6 2022 (ECF No. 19);

7           6.       The parties have reached an agreement to temporarily stay this case, which the  
8 parties are memorializing in a separate stipulation;

9           7.       Counsel for North American requests a 30-day extension, through and including  
10 Friday, August 26, 2022, for North American to file its response to Deutsche Bank's complaint,  
11 pending the Court's consideration of the aforementioned stipulation to stay this case;

12           8.       This is the fourth request for an extension made by counsel for North American,  
13 which is made in good faith and not for the purposes of delay.

14           9.       This stipulation is entered into without waiving any of North American's  
15 objections under Fed. R. Civ. P. 12.

16           **IT IS SO STIPULATED** that North American's deadline to respond to the complaint is  
17 hereby extended through and including Friday, August 26, 2022.

18 Dated: July 27, 2022

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair

KEVIN S. SINCLAIR

Attorneys for Defendant

NORTH AMERICAN TITLE INSURANCE  
COMPANY

21 Dated: July 27, 2022

WRIGHT FINLAY & ZAK, LLP

By: /s/-Lindsay D. Dragon

LINDSAY D. DRAGON

Attorneys for Plaintiff

DEUTSCHE BANK NATIONAL TRUST  
COMPANY

25 **IT IS SO ORDERED.**

26 Dated this 1st day of August, 2022.

27 Brenda N. Weksler  
BRENDA N. WEKSLER

UNITED STATES MAGISTRATE JUDGE